

THE HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KEVIN FRAZIER, an individual,

No. C09-5541-RJB

Plaintiff,

JOINT STIPULATION AND ORDER
FOR EXTENSION OF CASE
SCHEDULING DEADLINES AND
TRIAL DATE

v.

S1 IT SOLUTIONS, INC., an Idaho
corporation,

Defendant.

Plaintiff Kevin Frazier (“Plaintiff”) and Defendant S1 IT Solutions, Inc. (“Defendant”), by and through their respective counsel, stipulate as follows, and jointly move the Court for an Order for Extension of Case Scheduling Deadlines and Trial Date. This request is made to allow the parties to exchange documents and engage in meaningful settlement discussions before incurring substantial additional discovery fees and costs. The parties believe these continuances would be highly beneficial to the resolution process. The trial in this matter is currently set for August 9, 2010. This stipulation is made pursuant to FRCP 29. The parties stipulate to the following new deadlines:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Disclosure of expert testimony under FRCP 26(a)(2)	2/10/10	4/14/10
All motions related to discovery must be FILED by	3/22/10	5/24/10
JOINT STIPULATION AND ORDER FOR EXTENSION OF CASE SCHEDULING DEADLINES AND TRIAL DATE - 1		
Case No. C09-5541-RJB		
Gordon & Rees LLP 701 5 th Avenue, Suite 2100 Seattle, WA 98104 Ph: 206-695-5100 Fax: 206-689-2822		

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Discovery COMPLETED by	4/12/10	6/14/10
All dispositive motions must be filed by	5/11/10	7/13/10
Settlement conference per CR 39.1(c)(2) HELD no later Than	6/10/10	8/12/10
Mediation per 39.1(c)(2) HELD no later than	7/12/10	9/13/10
Letter of compliance as to CR 39.1 FILED by	7/19/10	9/20/10
Motion in limine should be FILED by	7/12/10	9/13/10
Agreed pretrial order LODGED with the court by	7/23/10	9/24/10
Pretrial conference will be HELD on	7/30/10 at 8:30 a.m.	9/24/10 at 8:30 a.m.
Trial briefs, proposed voir dire & jury instructions due	7/30/10	9/24/10
Three Day Bench Trial	8/9/10	10/4/10 or the Court's first available date thereafter

The parties hereby request the Court's approval of this stipulation.

Dated: March 24, 2010

PETER STUTHEIT ATTORNEY AT LAW
LLC

By: /s/ Peter Stutheit
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2 Dated: March 24, 2010

GORDON & REES LLP

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4 By: /s/ David W. Silke
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JOINT STIPULATION AND ORDER FOR
EXTENSION OF CASE SCHEDULING
DEADLINES AND TRIAL DATE - 3

Case No. C09-5541-RJB

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ORDER

The Court, having considered the foregoing stipulation of the parties,

It is hereby ORDERED that the stipulation of the parties is confirmed in all of its particulars, and the Court shall issue an Order reflecting the new case deadlines and trial date.

DATED this 24th day of March, 2010.

A handwritten signature in black ink, appearing to read "Robert J. Bryan", written over a horizontal line.

ROBERT J. BRYAN
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Peter D. Stutheit
Peter Stutheit Attorney at Law LLC
3524 NE 17th Avenue
Portland, OR 97212
peter@peterstutheit.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

DATED this 24th day of March, 2010.

By: /s/ David W. Silke
David W. Silke, WSBA #23761
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JOINT STIPULATION AND ORDER FOR
EXTENSION OF CASE SCHEDULING
DEADLINES AND TRIAL DATE - 5

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